

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton*  
Executive Director  
and Attorney-in-Chief

*Southern District of New York*  
*Jennifer L. Brown*  
Attorney-in-Charge

January 19, 2024

**VIA EMAIL**

**MEMO ENDORSED**


The Honorable Laura Taylor Swain  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Jonathan Acosta  
22 Cr 628 (LTS)**

Dear Chief Judge Swain,

I write with the consent of the Government to respectfully request the Court order that Pretrial Services return Mr. Acosta's passport to him. Pretrial requires an order when it still possesses the passport at the conclusion of the case, and Mr. Acosta's officer reached out to remind the defense to request its return before Pretrial is required by law to return it to the Department of State. I will inform Mr. Acosta that he is not allowed to travel outside of the United States without Probation and/or the Court's permission. Thank you for the Court's consideration.

Respectfully Submitted,

/s/ 

Ian Marcus Amelkin  
Federal Defenders of New York, Inc.  
(212) 417-8733  
ian\_marcus\_amelkin@fd.org

CC: Sarah Kushner, Esq.  
Assistant United States Attorney

The foregoing request is granted. The Office of Pretrial Services is respectfully directed to return Mr. Acosta's passport.

SO ORDERED.

January 22, 2024

/s/ Laura Taylor Swain, Chief USDJ